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Subject: [EXTERNAL] Bayer Project - Privileged and Confidential
Date: Wednesday, August 12, 2026 5:05:14 PM
Attachments: [image001.png](#)

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Sean,

I am writing to confirm that the Proposed 2025 Project will not, when considered in context with the Approved 2021 Project SEIR, have any new significant CEQA transportation impacts or cause any more severe transportation impacts than were already identified in the SEIR. Accordingly, the exchange of property contemplated under the Proposed 2025 Project is not a substantial project change. Nor are there, at issue, any substantial changes in circumstances or new information of substantial importance (which was not and could not have been known at the time the SEIR was approved), consistent with Fehr & Peers' July 10, 2025 analysis.

In this context, the primary concern is traffic safety, and the CEQA Guidelines accordingly inquire whether a project would "substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?"

Here, the original SEIR evaluated this question under Impact T-3, and concluded the Approved 2021 Project's conceptual development plan would rearrange the Bayer campus layout, requiring, at most, minor modifications to the public right-of-way (e.g., the opening and closing of new driveways along the campus' perimeter), such that impacts would be less than significant. Please see page 4.6-22 of the SEIR. Details would be determined in the future, when the conceptual development plan would be implemented, at which time City and applicant traffic engineers would ensure these minor changes would comply with emergency access requirements, the California Building Code, California Fire Code, and other circulation requirements. Under the Proposed 2025 Project, the result is the same. Only minor modifications to the public right-of-way might be necessary, and of the similar nature and scale as might occur under the Approved 2021 Project SEIR.

Since the transportation hazard assessment (Impact T-3) presented in the certified 2021 SEIR was based on conformance with the same standards that would apply to the Proposed 2025 Project, and since there is no evidence that design-level planning during project implementation would require anything other than potential minor modifications to the public right-of-way (and of the similar nature and scale as with the Approved 2021 Project), the finding in the SEIR that project implementation would have a less-than-significant impact on transportation hazards remains valid and applicable to the Proposed 2025 Project.

Regards,

Sam Tabibnia, P.E.

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